

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

|                                    |   |                            |
|------------------------------------|---|----------------------------|
| _____                              | ) |                            |
| Conservation Law Foundation, Inc., | ) |                            |
|                                    | ) | Case No. 1:18-cv-11820-DPW |
| Plaintiff,                         | ) |                            |
|                                    | ) |                            |
|                                    | ) |                            |
|                                    | ) |                            |
| v.                                 | ) |                            |
|                                    | ) |                            |
| Wequassett Inn LLP, d/b/a          | ) |                            |
| Wequassett Resort and Golf Club,   | ) |                            |
| and Weston & Sampson, Inc.,        | ) |                            |
|                                    | ) |                            |
| Defendants.                        | ) |                            |
| _____                              | ) |                            |

**JOINT MOTION FOR EXTENSION OF TIME TO SERVE COMPLAINT**

Pursuant to Local Rule 4.1(b), Plaintiff Conservation Law Foundation (“CLF” or “Plaintiff”) and Defendants Wequassett Inn LLP, d/b/a Wequassett Resort and Golf Club, and Weston & Sampson, Inc., (collectively “Defendants”), respectfully submit the following Joint Motion for a 60-day extension of the 90-day period for CLF to serve the Summons, Complaint and Civil Case Opening Documents on Defendants. The parties have good cause for seeking an extension of time under Fed. R. Civ. P. 6(b), as they are in negotiations in an effort to resolve or narrow the issues in the above captioned case. *See* Exhibit A (Affidavit of Heather A. Govern pursuant to LR 4.1(b)).

Dated: November 20, 2018

Respectfully submitted,

CONSERVATION LAW FOUNDATION, INC.

By its attorney:

/s/ Heather A. Govern

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WESTON & SAMPSON, INC.

By its attorney,

/s/ Eric Howard

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**CERTIFICATE PURSUANT TO LOCAL RULE 7.1(a)(2)**

I, as counsel for Plaintiff, hereby certify that I have conferred with counsel for all defendants on this motion and that defendants' counsel assented to and supports this motion, which is filed at the request of all parties.

/s/ Heather A. Govern  
Heather A. Govern

**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2018, the foregoing Joint Motion for Extension to Serve the Complaint was filed through the Court's electronic filing system ("ECF"), by which means a copy of the filing will be sent electronically to all parties registered with the ECF system.

/s/ Heather A. Govern  
Heather A. Govern